

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

---

**JESSICA JONES, et al.,**

Plaintiffs,

v.

**Varsity Brands, LLC, et al.,**

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**JURY DEMAND**

---

**OMNIBUS DECLARATION OF JOSEPH R. SAVERI IN SUPPORT OF PLAINTIFFS'  
OPPOSITIONS TO DEFENDANTS' *DAUBERT* MOTIONS**

---

**DECLARATION OF JOSEPH R. SAVERI**

I, Joseph R. Saveri, declare the following under penalty of perjury:

1. I am the Founder and Managing Partner of the Joseph Saveri Law Firm, LLP., counsel for Plaintiffs Jessica Jones and Christina Lorenzen (collectively, “Plaintiffs”), in *Jones v. Bain Capital Private Equity*, case no. 2:20-cv-02892-SHL-tmp (“Jones Action”). I am a member in good standing of the State Bar of California and have been admitted *pro hac vice* in the United States District Court for the Western District of Tennessee, Western Division. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify competently to them. I write this declaration in support of Plaintiffs’ Oppositions to Defendants’ *Daubert* Motions (“Motions”).

2. Attached as **Exhibit 1** is a true and correct copy the Expert Report of Randal Heeb, PhD, dated June 20, 2022, prepared for this action.

3. Attached as **Exhibit 2** is a true and correct copy of the Rebuttal Expert Report of Randal Heeb, PhD, dated December 14, 2022, prepared for this action. Attached as **Exhibit 2-1** is the Errata to Rebuttal Expert Report of Randal Heeb PhD, dated January 19, 2023, prepared for this action.

4. Attached as **Exhibit 3** is a true and correct copy of the Expert Report of Janet S. Netz, Ph.D., dated June 20, 2022, prepared in this action.

5. Attached as **Exhibit 4** is a true and correct copy of the Expert Rebuttal Report of Janet S. Netz, Ph.D., dated December 14, 2022, prepared for this action.

6. Attached as **Exhibit 5** is a true and correct copy of the Expert Damages Report of Jen Maki, PhD, dated June 20, 2022, prepared for this action.

7. Attached as **Exhibit 6** is a true and correct copy of the Expert Damages Rebuttal Report of Jen Maki, PhD, dated December 14, 2022, prepared for this action.

8. Attached as **Exhibit 7** is a true and correct copy of the Expert Report of James H. Aronoff, dated June 20, 2022, prepared for this action.

9. Attached as **Exhibit 8** is a true and correct copy of the Expert Rebuttal Report of James H. Aronoff, dated December 14, 2022, prepared for this action.

10. Attached as **Exhibit 9** is a true and correct copy of the deposition of Randal Heeb, PhD, dated January 19, 2023, taken in this action. Attached as **Exhibit 9-1** is a true and correct copy of Exhibit 5 to the deposition of Randal Heeb, PhD. Attached as **Exhibit 9-2** is a true and correct copy of Exhibit 11 to the deposition of Randal Heeb, PhD.

11. Attached as **Exhibit 10** is a true and correct copy of the deposition of Janet S. Netz, PhD, dated January 17, 2023, taken in this action.

12. Attached as **Exhibit 11** is a true and correct copy of the deposition of Jen Maki, PhD, dated January 23, 2023, taken in this action.

13. Attached as **Exhibit 12** is a true and correct copy of the deposition of James H. Aronoff, dated January 13, 2023, taken in this action.

14. Attached as **Exhibit 13** is a true and correct copy of the Expert Report of Kevin Murphy, dated September 23, 2022, prepared for this action. Attached as **Exhibit 13-1** is a true and correct copy of the Errata to the Expert Report of Kevin Murphy, dated November 4, 2022.

15. Attached as **Exhibit 14** is a true and correct copy of the deposition of Kevin Murphy, Vol. 1, dated November 3, 2022, taken in the *Fusion Elite* action (USDC WD TN Case No. 2:20-cv-02600-SHL-cgc) and the deposition of Kevin Murphy, Vol. 2, dated November 4, 2022, taken in this action.

16. Attached as **Exhibit 15** is a true and correct copy of excerpts of the deposition of Brian Elza, taken November 16, 2021, taken in this action.

17. Attached as **Exhibit 16** is a true and correct copy of experts of the deposition of Sarah Minzghor, dated December 17, 2021, taken in the *Fusion Elite* action (USDC WD TN Case No. 2:20-cv-02600-SHL-cgc).

18. Attached as **Exhibit 17** is a true and correct copy of excerpts of the deposition of Janine Cherasaro, dated February 2, 2022, taken in the *Fusion Elite* action (USDC WD TN Case No. 2:20-cv-02600-SHL-cgc).

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 31, 2023 in San Francisco, California.

/s/ Joseph R. Saveri  
Joseph R. Saveri